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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro No. 10-05133 (SMB)

FERN C. PALMER; PAMELA K. MARXEN; KURT
B. PALMER; and BRUCE N. PALMER; ESTATE OF
BOYER PALMER, in its capacity as the estate of
Boyer Palmer individually and as the former general
partner of B&F Palmer, L.P.; DIANE HOLMERS, in
her capacity as Personal Representative of the Estate of
Boyer Palmer; and BRUCE PALMER, in his capacity
as Personal Representative of the Estate of Boyer
Palmer,

Defendants.

NOTICE OF MOTION TO WITHDRAW THE REFERENCE

**TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE that Defendants Estate of Boyer Palmer, in its capacity as the former general partner of B&F Palmer, L.P.; Diane Holmers, in her capacity as Personal Representative of the Estate of Boyer Palmer; and Bruce Palmer, in his capacity as Personal Representative of the Estate of Boyer Palmer (“Defendants”), respectfully move the United States District Court for the Southern District of New York at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be determined by the Court, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules for the Southern District of New York, for an Order withdrawing the reference of the above-captioned adversary proceeding from the United States Bankruptcy Court for the Southern District of New York for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 8, 2021

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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